AIR AND RADIATION DIVISION CONCURRENCE SHEET

SUBJECT: Belmont Plating Works Inspection Report

THIS DOCUMENT CONTAINS CONFIDENTIAL BUSINESS INFORMATION YES (NO)

CONTROL NUMBER (if applicable): _____

	Name	Initials	Date
Typist			
Originator	K. Owens	KO	4/18/13
Reviewer			
Reviewer			
Section Chief	R. Frase	mail	5/9/13
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NAME OF DIVISION	**ORC**		
Assigned Staff Person			
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Other			

The originator and first level supervisor are responsible for assuring that documents are in plain language. All other reviewers should consider plain language in their reviews. For more information, see the plain language checklist on the reverse side of this sheet.

COMMENTS: 053784

RETURN TO: K. Owens

Updated: 2 25 13

Plain Language Checklist

Write in the active voice. When you use the active voice, the subject of the sentence acts: AEPA issued the permit to X.@ When you use the passive voice, the subject of the sentence is acted upon: AThe permit was issued to X.@ If you can ask ABy whom?@ or ABy what?@ after the verb, the verb is in the passive voice. A passive verb has a form of the verb Ato be@ (am, is, are, was, were, be, being, been) plus a main verb usually ending in Aen@ or Aed.@

Use action verbs. Use base verbs instead of nouns derived from verbs.

Don't' Say	Say	Don't Say	Say
is applicable to	applies to	make payment	pay
give considerations to	consider	take action	act

Use personal pronouns to represent the reader and to refer to EPA. For example, AThe United States Environmental Protection Agency (EPA, we) is issuing an order to X (you, your). We are offering you...@

Write short sentences to aid comprehension. Put one main thought in most sentences. Divide a long sentence into two or three short sentences. Remove all unnecessary words. If there are several conditions or subordinate provisions, make a list.

Omit surplus words and redundancies. Question the need for ~~each and~~ every word.

Don't Say	Say	Redundancies
for the period of	for	true and correct
in order to	to	cease and desist
in the event that	if	order and direct

Place words carefully to reduce ambiguity. Keep subjects and objects close to verbs. Put modifying phrases and words such as Aonly@ and Aalways@ next to the word they modify. She *only* said that he hired her. She said that *only* he hired her. She said that he hired *only* her.

Be consistent. Don=t use different words to refer to the same thing (car, vehicle, automobile).

Limit your use of abbreviations and capital letters. Use abbreviations only to refer to terms that are central to the document. Do not abbreviate terms that you only use a few times. Use capital letters to begin sentences and proper names and for headings. You should reconsider all other uses.

Visit the plain language web site at www.plainlanguage.gov.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 West Jackson Boulevard
Chicago, Illinois 60604

DATE: MAY 0 9 2013

SUBJECT: INSPECTION REPORT – Belmont Plating Works, Inc., Chicago, IL

FROM: Katie Owens, Environmental Engineer

THRU: Nathan A. Frank, Chief
Air Enforcement and Compliance Assurance Section, (IL/IN)

TO: File

Date of Inspection: February 5, 2013

Attendees: Katie Owens, Environmental Engineer, U.S. EPA
Ray Cullen, Environmental Engineer, U.S. EPA
Mark Toni, President, Belmont Plating Works, Inc.
Roy Newman, Office Manager, Belmont Plating Works, Inc.
Bob Bethel, Plant Manager, Belmont Plating Works, Inc.

Purpose of Inspection: The purpose of the inspection was to investigate compliance of Belmont Plating Works, Inc. (BPW) with the National Emission Standards for Hazardous Air Pollutants for Plating and Polishing Operations at 40 C.F.R. Part 63, Subpart WWWWWW and the National Emission Standards for Hazardous Air Pollutants for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks at 40 C.F.R. Part 63, Subpart N.

Company Description and Background:

Location: 9145 King Street, Franklin Park, Illinois 60131

Primary Contact: Mark Toni, President, Belmont Plating Works, Inc.

BPW is a metal plating company with cadmium, chromium, copper, nickel, tin and zinc plating operations.

Opening Discussion and Process Overview

Mr. Cullen and I arrived at BPW at 9:38 am. Initially Mr. Cullen and I entered through a side door in the plating operations building. After a period of time we encountered someone who spoke English who directed us to go to the main office, three buildings down the street. Mr. Cullen and I exited the plating building and proceeded to the office building. Mr. Cullen and I entered the main office at 9:45 am. Mr. Cullen and I greeted the receptionist, presented our credentials, and explained that we were on an unannounced Clean Air Act (CAA) inspection to investigate compliance of this facility. The receptionist asked us to wait while she got Roy Newman, Office Manager. Mr. Newman greeted us in the reception area and immediately asked us to speak with BPW's Environmental Manager.

Mr. Cullen and I explained the reason for our visit and requested that we begin with basic information about BPW. Mr. Cullen and I requested a facility schematic. Mr. Newman said he didn't know where one was. Mr. Newman said he has worked as the Office Manager since 1996. Mr. Newman dialed Joann Kepura, BPW's Environmental Consultant, to answer our questions. Ms. Kepura works for Scientific Control Labs. Mr. Cullen talked with Ms. Kepura, while I called Mark Toni, President of BPW, to get general information about BPW. Mr. Toni stated that he was 10 minutes away and would be in shortly to answer our questions. Mr. Toni stated that BPW started in 1948 and the facility was situated on Belmont Avenue until the 1970's.

Meanwhile, Mr. Cullen was talking with Ms. Kepura who stated she was 45 minutes away and was the only person who dealt with BPW's environmental issues. Mr. Cullen stated that she didn't need to come to BPW; rather we would issue a 114 for the information.

Mr. Newman stated that the plating building is made up of two connected buildings. Mr. Newman has been working at BPW for 30 years. Mr. Cullen and I asked Mr. Newman how many employees work at BPW. Mr. Newman stated that BPW has approximately 70 employees that work two shifts (7 – 3:30 and 3:30 – midnight) five days per week.

Mr. Newman stated that about 90% of BPW's business is local (within 30 miles). Mr. Newman explained that half the business focuses on bolts, nuts, screws and fasteners. BPW completes about 100 jobs per day.

Mr. Newman stated that he did not want Mr. Cullen or I to ask Bob, Plant Manager, any questions, rather we should wait to ask Mr. Toni.

Following the phone calls, Mr. Newman asked us to wait in the reception until Mr. Toni arrived. Mr. Toni arrived at 10:10 am and escorted us to his conference room.

Mr. Cullen and I restated the reason for our visit and began by asking general questions about BPW. Mr. Toni stated that BPW has been in business since 1953. Mr. Cullen and I asked about the type of plating that occurs at BPW. Mr. Toni replied that BPW plates with zinc, nickel, tin, copper, and cadmium, all of which are electrolytic. Mr. Cullen and I asked Mr. Toni to detail the number of tanks for each of the formerly mentioned metals. Mr. Toni replied that he doesn't know the number of each tank. Mr. Toni stated that BPW has a small hexavalent, decorative chromium tank that is used about 1 – 2 hours per day. Mr. Toni stated that BPW does not use a degreaser.

Mr. Toni said that his plant manager, Bob Bethel would meet us in reception to give us a tour of the plating operations.

Mr. Toni escorted us to the reception to wait for Mr. Bethel.

Mr. Bethel met Mr. Cullen and I in the reception and escorted us back to the plating building. Mr. Bethel stated that the barrel zinc is the largest line at BPW with about 40 employees.

Facility Tour

Mr. Bethel, Mr. Cullen and I entered the plating building at 10:30 am. Upon entering Mr. Cullen and I observed the alkaline cleaner for steel and brass. Mr. Cullen and I walked on the plating line and first observed a cyanide copper rack tank. Next we observed a zinc chloride solution (non-cyanide). I noted that this tank had the heaviest odor so far on our tour. Next we observed a cyanide cadmium rack tank.

Mr. Cullen and I asked if the tanks were always open. Mr. Bethel stated that all the tanks are open at all times. Next we observed the hexavalent, decorative chromium tank. I observed the tank to be about 4' wide with an attached intake. Mr. Bethel stated that this tank was vented to the roof. Mr. Bethel stated that BPW uses fume suppressant, added per amp-hour, and never drains the baths. Mr. Bethel stated that Scientific Control manages the surface tension testing. The final tank we observed in Building 1 was the rack nickel tank.

Mr. Bethel stated that the plating building is made up of three connected buildings. Continuing the tour, we entered Building 2. Upon entering I noted a very strong odor.

First we came to a barrel cyanide copper tank. Following we observed two plating lines which contained barrel nickel and cyanide cadmium tanks. I asked about the sludge collection procedures at BPW. Mr. Bethel stated that the sludge is picked up by Envirite of Illinois about every 2 – 3 weeks. Sludge is stored in a covered sludge box between collections. Next we observed an automatic zinc chloride line.

Following the second zinc chloride line we walked by BPW's wastewater treatment area. Mr. Bethel stated that BPW has a closed loop wastewater treatment system.

Continuing the tour, we entered Building 3 where we observed another zinc chloride line which

was described, by Mr. Bethel, to be fully automatic. The final tank we observed was a zinc chromate tank with trivalent chromium.

Prior to departing the plating building, Mr. Bethel escorted us to the lab. Mr. Bethel stated that the lab verifies tank concentrations and checks the wastewater throughout the day.

The tour ended at 10:50 am.

Standard bcc:s: official file copy w/attachment (s)
originator's file copy w/attachment (s)
originating organization reading file w/attachment (s)

other bcc's:

Created: April 17, 2013

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